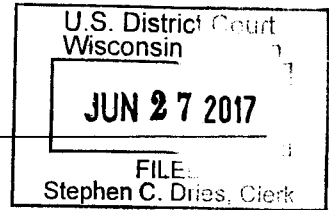


UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN



UNITED STATES OF AMERICA,

Plaintiff,

v.

**17-CR-121**

Case No. 17-CR-  
[18 U.S.C §§ 2, 371, 844(h), and  
924(c)(1)(A)(ii), 2113(a) and (d)]

MONTRELL HOWARD,  
CHRISTIAN BROOKS,  
MALIK CRITTON, and  
CHRISTOPHER CRITTENDON,

Defendants.

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**INDICTMENT**

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**COUNT ONE**

**THE GRAND JURY CHARGES:**

In May 2016 in the State and Eastern District of Wisconsin,

**CHRISTIAN BROOKS,  
MALIK CRITTON, and  
MONTRELL HOWARD**

knowingly and willfully conspired and agreed with each other and with other persons both known and unknown to the grand jury, to take, by force, violence, and intimidation, from the presence of bank employees, U.S. currency belonging to and in the care, custody, and management of federally insured financial institutions, and in

the commission of the offenses, put in jeopardy the life of employees by use of a dangerous weapon, namely a firearm, all in violation of Title 18, United States Code, Section 2113(a) and (d), and in furtherance of the conspiracy and to effect the objects of the conspiracy, one or more of the defendants committed the following overt acts, among others, in the Eastern District of Wisconsin:

- a. On or about May 13, 2016, purchased bank robbery supplies including but not limited to black knit hats from the Beauty Island store located at 5225 W. Fond du Lac Ave., Milwaukee, Wisconsin.
- b. On or about May 13, 2016, destroyed evidence by setting fire to the vehicle they used to flee the scene of Tri City Bank, a federally insured financial institution, in Brown Deer, Wisconsin.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 13, 2016, in the State and Eastern District of Wisconsin,

**CHRISTIAN BROOKS,  
MALIK CRITTON, and  
MONTRELL HOWARD**

did take by force, violence, and intimidation, from the presence of a teller, U.S. currency belonging to and in the care, custody, control, management, and possession of the Tri City Bank, located on W. Bradley St., Brown Deer, Wisconsin, a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing this offense, put in jeopardy the life of the teller by the use of a dangerous weapon, *to wit*: a firearm.

In violation of Title 18, United States Code, Sections 2113(a) and (d) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 13, 2016, in the State and Eastern District of Wisconsin,

**CHRISTIAN BROOKS,  
MALIK CRITTON, and  
MONTRELL HOWARD**

did knowingly brandish a firearm during and in relation to a crime of violence, for which each may be prosecuted in a court of the United States, that is Count Two of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 13, 2016, in the State and Eastern District of Wisconsin,

**CHRISTIAN BROOKS,  
MALIK CRITTON, and  
MONTRELL HOWARD**

knowingly and maliciously used fire to commit a felony prosecutable in a court of the United States, *to wit*: conspiracy to commit bank robbery in violation of Title 18, United States Code, Section 371 as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Sections 844(h) and 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 29, 2016, in the State and Eastern District of Wisconsin,

**MONTRELL HOWARD and  
CHRISTOPHER CRITTENDON**

did take by force, violence, and intimidation, from the presence of a teller, U.S. currency belonging to and in the care, custody, control, management, and possession of the North Shore Bank, located on W. North Ave., Wauwatosa, Wisconsin, a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing this offense, put in jeopardy the life of the teller by the use of a dangerous weapon, *to wit*: a firearm.

In violation of Title 18, United States Code, Sections 2113(a) and (d) and 2.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 29, 2016, in the State and Eastern District of Wisconsin,

**MONTRELL HOWARD and  
CHRISTOPHER CRITTENDON**

did knowingly brandish a firearm during and in relation to a crime of violence, for which each may be prosecuted in a court of the United States, that is Count Five of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

### FORFEITURE NOTICE

1. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 371, 2113(a) and 844(h), as set forth in Counts One, Two, Four, and Five of this Indictment, the defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, a sum of money equal to the proceeds derived from the offense.

2. Upon conviction of the offenses, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offenses.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).



A TRUE BILL:

  
FOREPERSON

Dated: 06/27/2017

*Kelly D. Napier*  
for GREGORY J. HAANSTAD  
United States Attorney